

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

THEODUS JORDAN)	
)	
Plaintiff,)	Civil Action No.
)	04-cv-10688NMG
v.)	
)	
BOSTON PUBLIC SCHOOLS)	
)	
)	
Defendant)	
)	

**DEFENDANT, BOSTON PUBLIC SCHOOLS' DISCLOSURE PURSUANT TO
RULE 26 OF THE FEDERAL RULES OF CIVIL PROCEDURE**

I. FED. R. CIV. P. RULE 26(a)(1)(A) DISCLOSURE:

The following individuals are likely to and/or may have discoverable information relevant to the above captioned matter:

1. Wanda Manzo, Staffing, Secondary Schools and Substitues, Boston Public Schools, 26 Court Street, Boston, Massachusetts, 02108 (617)635-9382;
2. Ray Shurtleff, Retired Director of Human Resources, c/o Office of Legal Advisor, Boston Public Schools, 26 Court Street, Boston, MA 02108;
3. Edward Kelleher, Humar Resources, Assistant Director of Information Management, Boston Public Schools, 26 Court Street, Boston, Massachusetts, 02108 (617)635-9670;
4. Barbara Fields, Senior Equity Officer, Boston Public Schools, 26 Court Street, Boston, Massachusetts, 02108 (617)635-9650;
5. Janet M. Short, former principal Tobin School, c/o Office of Legal Advisor, Boston Public Schools, 26 Court Street, Boston, MA 02108;
6. Steven Leonard, former principal Martin L. King, Jr. Middle School, c/o Office of Legal Advisor, Boston Public Schools, 26 Court Street, Boston, MA 02108;

7. Barbara McGann, Former Director of Human Resources, c/o Office of Legal Advisor, Boston Public Schools, 26 Court Street, Boston, MA 02108;
8. Joseph Shea, Staffing Director, Human Resources, Boston Public Schools, 26 Court Street, Boston, Massachusetts, 02108 (617)635-9670;

II. FED. R. CIV. P. RULE 26(a)(1)(b) DISCLOSURE:

All non-privileged documents are available for inspection at the Office of Legal Advisor, Boston Public Schools, 26 Court Street, 7th Floor, Boston, Massachusetts, Monday through Friday, 9:00 a.m. to 5:00 p.m., appointment requested.

1. Substitute Teachers contract between the Boston School Committee and the Boston Teachers Union.
2. Policies adopted by the Boston Public Schools (also available via public website <http://www.boston.k12.ma.us>).
3. Theodus Jordan personnel file.
4. Payroll records for Theodus Jordan.
5. Substitute teaching records of calls taken, declined and offered to Theodus Jordan.
6. Correspondence between Plaintiff and various agents of the Defendant.
7. Documents submitted by Theodus Jordan to the Massachusetts Commission Against Discrimination in connection with Docket Number 01-BEM -131721.
8. Documents in connection with Suffolk Superior Court Civil Action 91-5742, Jordan v. Boston Public Schools and Teachers Credit Union.
9. Documents in connection with United States District Court, District of Massachusetts Civil Action 98-12162-JLT, Jordan v. Boston Public Schools et al.
10. Documents in connection with Massachusetts Commission of Discrimination Docket number 92-BEM-1205, Jordan v. Boston Public Schools.
11. Documents in connection with Massachusetts Commission of Discrimination Docket number 01-1310554, Jordan v. Boston Public Schools.

III. FED.R.CIV.P.RULE 26(a)(1)(C) DISCLOSURE:

All non-privileged documents are available for inspection at the Office of Legal Advisor, Boston Public Schools, 26 Court Street, 7th Floor, Boston, Massachusetts, Monday through Friday, 9:00 a.m. to 5:00 p.m., appointment requested.

Defendant states that it is not claiming any category of damages.

IV. FED.R.CIV.P.RULE 26(a)(1)(D) DISCLOSURE:

All non-privileged documents are available for inspection at the Office of Legal Advisor, Boston Public Schools, 26 Court Street, 7th Floor, Boston, Massachusetts, Monday through Friday, 9:00 a.m. to 5:00 p.m., appointment requested.

Defendant states that it is self-insured.

Defendant,
BOSTON PUBLIC SCHOOLS
By it's attorney,
William F. Sinnott, Corporation Counsel

/s/ Andrea Alves Thomas
Andrea Alves Thomas, BBO#660050
Assistant Corporation Counsel
Boston Public Schools
Office of Legal Advisor
26 Court Street, 7th Floor
Boston, MA 02108
(617) 635-9320

CERTIFICATE OF SERVICE

I, Andrea Thomas, hereby certify that a true copy of the above document was served by Certified Mail, Return Receipt Requested, this 27th day of November, 2006 upon Plaintiff at:

Theodus Jordan
P.O. Box 840
Jamaica Plain, MA 02130-0036

/s/ Andrea Alves Thomas
Andrea Alves Thomas